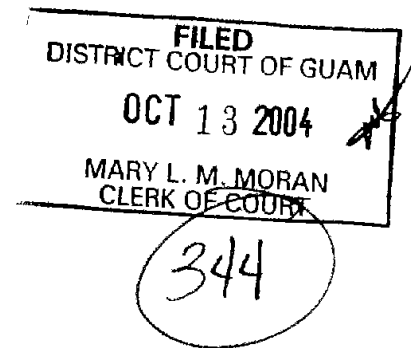


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**IN THE UNITED STATES
DISTRICT COURT OF GUAM**

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,
Plaintiffs,

vs.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD., a
Foreign corporation, JOHN DOE I
through JOHN DOE X,
Defendants.

CIVIL CASE NO. 03-00036

**NOTICE OF MOTION AND
PLAINTIFFS' MOTION TO
COMPEL ANSWERS TO
PLAINTIFFS' FIFTH SET OF
REQUESTS FOR PRODUCTION
OF DOCUMENTS**

**TO: DEFENDANT HONGKONG AND SHANGHAI BANKING CORPORATION,
LTD. AND ITS ATTORNEYS OF RECORD BRONZE & TANG AND LAW
OFFICES OF RICHARD A. PIPES:**

PLEASE TAKE NOTICE that plaintiffs will bring on for hearing their Motion for Sanctions on or after November 3, 2004, at _____m. or as soon thereafter as the matter may be heard before the Honorable Magistrate Judge in the U.S. District Court of Guam, 4th Floor, U. S. Courthouse, 520 West Soledad Avenue, Hagatna, Guam 96910.

Plaintiffs' motion is based on F.R.C.P. Rules 26, 34, and 37, the memorandum of points and authorities in support of the motion, the declaration of Anita P. Arriola and exhibits attached thereto,

ORIGINAL

all of the pleadings and records filed in this action, and any oral or documentary evidence that may be adduced at the hearing thereon.

DATED this 13th day of October, 2004.

ARRIOLA, COWAN & ARRIOLA
Attorneys for Plaintiffs Alan Sadhwani, et al.

By: 
ANITA P. ARRIOLA

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910

CERTIFICATE OF SERVICE

I, ANITA P. ARRIOLA, hereby certify that on October 13, 2004, I caused to be served via hand delivery, a **NOTICE OF MOTION AND PLAINTIFFS' MOTION TO COMPEL ANSWERS TO PLAINTIFFS' FIFTH SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS** to:

**Jacques G. Bronze, Esq.
Bronze & Tang, P.C.
2nd Floor, BankPacific Building
825 S. Marine Drive
Tamuning, Guam 96913**

Dated this 13th day of October, 2004.


ANITA P. ARRIOLA

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910